

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOE LOUIS BROWN,

Plaintiff,

-against-

NASSAU COUNTY,

Defendant.

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10cv5062 (JS) (AKT)

**NOTICE OF MOTION  
TO DISMISS THE  
AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the Declaration of Michelle M. Faraci, and the exhibits annexed thereto dated April 25, 2011 and the accompanying Memorandum of Law dated April 25, 2011, Defendant Nassau County, will move this Court as soon as counsel may be heard at the United States Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, for an order, on a date to be determined by the Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing Plaintiff's amended complaint on the ground that it fails to state a valid cause of action and for any such other and further relief as this Court deems just and proper.

Dated: Mineola, New York  
April 25, 2011

JOHN CIAMPOLI  
Nassau County Attorney

By:   
Michelle M. Faraci (MF9839)  
Deputy County Attorney  
Attorneys for Defendant  
One West Street  
Mineola, New York 11501  
(516) 571-3931

To: Joe Louis Brown  
*Pro Se Plaintiff*  
40 W. Columbia Street  
Apt. 423  
Hempstead, New York 11550

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Plaintiff,

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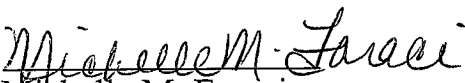
Defendant.

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**JOHN CIAMPOLI**  
Nassau County Attorney

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Michelle M. Faraci,  
Deputy County Attorney  
One West Street  
Mineola, New York 11501  
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